



**BAY AREA AIR QUALITY
MANAGEMENT DISTRICT**

939 ELLIS STREET
SAN FRANCISCO, CALIFORNIA 94109
(415) 771-6000

A0208

**PERMIT
TO OPERATE**

Plant# 208

Page: 1

Expires: NOV 1, 2009

This document does not permit the holder to violate any District regulation or other law.

Jess Anthony
Schnitzer Steel Products Company
P O Box 747
Oakland, CA 94604

Location: Adeline St, Foot of
Oakland, CA 94607

| S# | DESCRIPTION | [Schedule] | PAID |
|----|--|-----------------------|------|
| 6 | MTGL/SEC> Crushing/shredding, Steel Shredder w/ water injection, electric, 225 tph (avg.) Abated by: A6 Water Spray System A2 Simple Cyclone A3 Irrigated Cyclone Scrubber A4 Moving Belt Dry Filter A9 Simple Cyclone A5 Mist Eliminator Emissions at: P1 Stack | [F] | 239 |
| 7 | MTGL/SEC> Conveying, Steel Infeed Conveyor (electric) Abated by: A6 Water Spray System A2 Simple Cyclone A3 Irrigated Cyclone Scrubber A4 Moving Belt Dry Filter A9 Simple Cyclone A5 Mist Eliminator Emissions at: P1 Stack | [F] | 217 |
| 8 | Diesel engine, 896 hp, Caterpillar S/N 81Z24471 Pier Crane Diesel Engine Abated by: A8 Catalyzed Diesel Particulate Filter Emissions at: P8 Stack | Paid Thru 05-09-09 | --- |

The operating parameters described above are based on information supplied by permit holder and may differ from the limits set forth in the attached conditions of the Permit to Operate. The limits of operation in the permit conditions are not to be exceeded. Exceeding these limits is considered a violation of District regulations subject to enforcement action.


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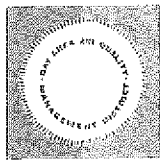
| S# | DESCRIPTION | [Schedule] | PAID |
|----|---|-----------------------|------|
| 9 | Standby Diesel engine, 300 hp, Cummins, 854 cu in Emergency Standby Diesel Generator Set Emissions at: P9 Stack | Paid Thru 04-15-09 | --- |
| 10 | MISC-HDLG> Storage, Flyash Fly Ash Silo Abated by: A10 Baghouse, Pulse Jet Emissions at: P10 Stack | Paid Thru 05-09-09 | --- |

 ~~~~~  
 5 Permit Sources, 0 Exempt Sources

\*\*\* See attached Permit Conditions \*\*\*

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\*\*\* PERMIT CONDITIONS \*\*\*

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|            |                      |           |
|------------|----------------------|-----------|
| Source# 6  | subject to Condition | ID# 23114 |
| Source# 7  | " " "                | ID# 23114 |
| Source# 8  | subject to Condition | ID# 24124 |
| Source# 9  | subject to Condition | ID# 22820 |
| Source# 10 | subject to Condition | ID# 24125 |


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Page: 4

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COND# 22820 applies to S# 9

1. The owner/operator shall not exceed 20 hours per year per engine for reliability-related testing.  
[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e) (2) (A) (3) or (e) (2) (B) (3)]
2. The owner/operator shall operate each emergency standby engine only for the following purposes: to mitigate emergency conditions, for emission testing to demonstrate compliance with a District, State or Federal emission limit, or for reliability-related activities (maintenance and other testing, but excluding emission testing). Operating while mitigating emergency conditions or while emission testing to show compliance with District, State or Federal emission limits is not limited.  
[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e) (2) (A) (3) or (e) (2) (B) (3)]
3. The owner/operator shall operate each emergency standby engine only when a non-resettable totalizing meter (with a minimum display capability of 9,999 hours) that measures the hours of operation for the engine is installed, operated and properly maintained.  
[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e) (4) (G) (1)]
4. Records: The owner/operator shall maintain the following monthly records in a District-approved log for at least 36 months from the date of entry (60 months if the facility has been issued a Title V Major Facility Review Permit or a Synthetic Minor Operating Permit). Log entries shall be retained on-site, either at a central location or at the engine's location, and made immediately available to the District staff upon request.
  - a. Hours of operation for reliability-related activities (maintenance and testing).
  - b. Hours of operation for emission testing to show compliance with emission limits.
  - c. Hours of operation (emergency).


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Page: 5

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- d. For each emergency, the nature of the emergency condition.
- e. Fuel usage for each engine(s).

[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e) (4) (I), (or, Regulation 2-6-501)]

5. At School and Near-School Operation:

If the emergency standby engine is located on school grounds or within 500 feet of any school grounds, the following requirements shall apply:  
The owner/operator shall not operate each stationary emergency standby diesel-fueled engine for non-emergency use, including maintenance and testing, during the following periods:

- a. Whenever there is a school sponsored activity (if the engine is located on school grounds)
- b. Between 7:30 a.m. and 3:30 p.m. on days when school is in session. "School" or "School Grounds" means any public or private school used for the purposes of the education of more than 12 children in kindergarten or any of grades 1 to 12, inclusive, but does not include any private school in which education is primarily conducted in a private home(s). "School" or "School Grounds" includes any building or structure, playground, athletic field, or other areas of school property but does not include unimproved school property.

[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e) (2) (A) (1)] or (e) (2) (B) (2)]

COND# 23114 applies to S#'s 6, 7

S-6 & S-7 Shredder and Infeed conveyor  
(A# 14194)

- 1. The owner/operator shall not exceed the scrap throughput limit of 431,471 tons in any consecutive 12-month period at this facility.  
(basis: baseline; 2005 production level;


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CEQA exemption)

2. The owner/operator shall enclose and vent the shredder to the abatement system at all times it is operating to minimize fugitive emissions. (basis: TBACT)
3. The owner/operator shall abate particulate emissions from the shredder by water injection at a sufficient rate to ensure that non-metallic material exiting the unit be moist to the touch at all times, and abatement system consisting of cyclones, scrubber, filter, and demister at all times when the shredder is in operation. The PM grain loading at the exhaust outlet of the abatement system shall not exceed 0.01 gr/dscf. (basis: TBACT)
4. The owner/operator shall operate the Recycling Center in such a manner that particulate emissions into the atmosphere from any operation/equipment for a period or periods aggregating more than three minutes in any hour shall not cause a visible emission which is as dark or darker than No. 0.5 on the Ringelmann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree or result in fallout on adjacent property in such quantities as to cause public nuisance per District Regulation 1-301. (basis: Regulations 6-301; 1-301)
5. The owner/operator shall use water spray to minimize fugitive dust emissions from material/scrap handling and storage to comply with condition 4. The owner/operator shall pave the site truck transport roads and sweep/spray with water/other actions deemed appropriate by the District, if necessary, to minimize fugitive dust emissions from trucking activities to comply with condition 4. (basis: Regulations 6-301; 1-301)
6. In order to demonstrate compliance with condition number 1, the owner/operator shall keep records of monthly and yearly throughput in a District approved log. The log shall be maintained for a period of at least 24 months from the date of data entry and shall be made available to the District staff upon request


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for inspection. (basis: recordkeeping)

COND# 24124 applies to S#'s 8, 10

S-8, Pier Crane Engine

1. The Permit Holder shall abate emissions from S-8 by a catalyzed particulate filter (Clean Air Systems) at all times it is operating. (basis: BACT, cumulative increase, toxic risk screening)
2. The Permit Holder shall ensure that the exhaust point of the engine stack is at least 55 feet above the mean sea level. (basis: toxic risk screening)
3. The Permit Holder shall operate S-8 for no more than 2600 hours in any consecutive 12-month period. (basis: toxic risk screening, cumulative increase)
4. In order to demonstrate compliance with part 3 of the permit condition, the Permit Holder shall maintain the following records in a District approved logbook. The records shall be kept on site for a period of at least 24 months from the date of data entry, and be made available to the District staff for inspection.
  - a. Daily hours of operation
  - b. Daily hours totaled on a monthly basis (basis: Regulation 9-8-530)

COND# 24125 applies to S# 10

S-10, Fly ash Silo

1. The Permit Holder shall ensure the visible particulate emissions from the silo do not exceed Ringelmann Number 0.5 (or equivalent opacity) or result in fall out on adjacent property in such quantities as to cause annoyance to any other person. (basis: Regulation 6-1-301, 1-301)
2. The Permit Holder shall not exceed a


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throughput of 21,900 tons of fly ash in any consecutive 12-month period. (basis: cumulative increase)

3. The Permit Holder shall abate emissions from the silo by a filter, A-10, at all times the silo is in operation. The filter shall be functioning properly within the manufacturer's specified pressure drop range. (basis: cumulative increase)
4. In order to demonstrate compliance with part 2 of the condition, the Permit Holder shall keep daily, monthly, and consecutive 12-month records of the material throughput in a District approved logbook. The records shall be kept on site for at least 24 months from the date of data entry and be made available to the District staff for inspection. (basis: cumulative increase, recordkeeping)

~~~~~ END OF CONDITIONS ~~~~~


Bay Area Air Quality
Management District

** SOURCE EMISSIONS **

PLANT # 208
Oct 28, 2008

| S# | Source Description | Annual Average lbs/day | | | | |
|-------------|--|------------------------|------|-----|-----|----|
| | | PART | ORG | NOx | SO2 | CO |
| 6 | Shredder w/ water injection, electric, 225 | .6 | 25.3 | - | - | - |
| 7 | Infeed Conveyor (electric) | - | - | - | - | - |
| 8 | Pier Crane Diesel Engine | - | - | - | - | - |
| 9 | Emergency Standby Diesel Generator Set | - | - | - | - | - |
| 10 | Fly Ash Silo | - | - | - | - | - |
| T O T A L S | | .6 | 25.3 | | | |

** PLANT TOTALS FOR EACH EMITTED TOXIC POLLUTANT **

| Pollutant Name | Emissions lbs/day |
|----------------|-------------------|
| Benzene | .01 |